

# EXHIBIT J

November 17, 2020

1

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

- STUART VARDAMAN -

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

----- X

ULKU ROWE,

Plaintiff,

Case No.  
19 Civ. 08655 (LGS) (GWG)

v.

GOOGLE LLC

Defendant.

----- X

DATE: November 17, 2020

TIME: 9:37 a.m.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION

OF STUART VARDAMAN, held via Zoom, pursuant to ^

Notice, before Hope Menaker, a Shorthand Reporter

and Notary Public of the State of New York.

1 - STUART VARDAMAN -

2 Q. And do you still work at Google?

3 A. I do.

4 Q. And so when you joined Google, into  
5 what position did you join?

6 A. I joined as an executive recruiter,  
7 Level 5.

8 Q. And were you supporting any  
9 particular business group?

10 A. Yes.

11 Q. What business group?

12 A. Google Cloud and specifically the  
13 majority of my work centered on Tariq Shaukat's  
14 organization.

15 Q. When you joined Google, did you  
16 receive any training from Google relevant to your  
17 role?

18 A. Yes.

19 Q. What training did you receive?

20 A. Variety of onboarding trainings in  
21 addition to specific trainings related to the  
22 systems and the process.

23 Q. What systems were you trained on?

24 A. GHire is one that I mentioned  
25 earlier.

1 - STUART VARDAMAN -

2 they maybe were considered for. That type of  
3 stuff.

4 Q. Who has access to Thrive?

5 A. It would have been the search team.

6 Q. Anyone other than the search team  
7 have that sort of access to Thrive?

8 A. And when I say "search team," I mean  
9 our organization, the -- the executive recruiting  
10 organization.

11 Q. Anyone other than the executive  
12 recruiter organization that has access to Thrive?

13 A. No.

14 Q. Who has access to GHire?

15 A. The required people in the people Ops  
16 organization --

17 Q. Who were those?

18 A. -- the required organization.

19 Q. Who were those?

20 A. From my point of view, the ones I  
21 could speak to confidently would be the recruiting  
22 organization, the scheduling organization. Yeah.

23 Q. What could Thrive do that GHire could  
24 not?

25 A. One example would be the ability to